

1 DICKINSON WRIGHT PLLC
 2 Cynthia L. Alexander, Esq.
 3 Nevada Bar No. 6718
 4 Kerry E. Kleiman, Esq.
 5 Nevada Bar No. 14071
 6 3883 Howard Hughes Parkway, Suite 800
 7 Las Vegas, NV 89169
 8 Tel: 702-550-4400
 9 Fax: 844-670-6009
 10 Email: CAlexander@dickinsonwright.com
 11 Email: KKleiman@dickinsonwright.com
 12 *Attorneys for Defendant Premier Land Title Insurance*
 13 *Company f/k/a Commerce Title Insurance Company*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DEUTSCHE BANK NATIONAL TRUST
 13 COMPANY, AS TRUSTEE FOR GSAA
 14 HOME EQUITY TRUST 2006-16, ASSET-
 BACKED CERTIFICATES, SERIES 2006-16,

15 Plaintiff,
 16 vs.
 17 PREMIER LAND TITLE INSURANCE
 18 COMPANY F/K/A COMMERCE TITLE
 19 INSURANCE COMPANY, DOE
 20 INDIVIDUALS I through X; and ROE
 CORPORATIONS XI through XX, inclusive,

21

 Defendants.

22 Case: 2:22-cv-00439-APG-EJY

23 **STIPULATION AND ORDER FOR
EXTENSION OF TIME TO ANSWER
PLAINTIFF'S COMPLAINT**

24 **(FIRST REQUEST)**

25 Pursuant to Rules 6(b) and 16(b)(4) of the Federal Rules of Civil Procedure and LR 7-1, LR
 26 IA 6-1, 6-2, IT IS HEREBY STIPULATED by and between the undersigned, counsel of record for
 Plaintiff Deutsche Bank National Trust Company, as Trustee for GSAA Home Equity Trust 2006-
 27 16, Asset – Backed Certificates, Series 2006-16 (“Plaintiff”) and Defendant Premier Land Title
 Insurance Company f/k/a Commerce Title Insurance Company (“Premier”) (sometimes referred to

1 collectively as the “Parties”), that the Parties consent to extend the deadline for Defendant’s Answer
 2 to Plaintiff’s Complaint up to and including March 24, 2022.

3 This is Defendant’s first stipulation for an extension of time to file a response to the
 4 Complaint. Currently, the Answer is due on March 17, 2022. The one-week extension is requested
 5 in order to provide the Defendant’s counsel time to gather additional information and
 6 documentation necessary to adequately respond to the Complaint, and not for purposes of delay.
 7

8 Dated this 16th day of March, 2022.

9 **WRIGHT, FINLAY & ZAK, LLP**

10 By: /s/ Lindsay Dragon

11 Darren T. Brenner, Esq.
 12 Nevada Bar No. 8386
 13 Lindsay Dragon, Esq.
 14 Nevada Bar No. 13474
 15 7785 W. Sahara Ave., Suite 200
 16 Las Vegas, NV 89117
 17 Tel: 702-475-7964

18 Victoria Hightower, Esq.
 19 Nevada Bar No. 10897
 20 Tyson and Mendes
 21 170 South Green Valley Parkway
 22 Suite 300
 Henderson, NV 89012
*Attorneys for Plaintiff Deutsche Bank
 National Trust Company, as Trustee for
 GSAA Home Equity Trust 2006-16, Asset –
 Backed Certificates, Series 2006-16*

Dated this 16th day of March, 2022.

DICKINSON WRIGHT PLLC

By: /s/ Cynthia L. Alexander

Cynthia L. Alexander, Esq.
 Nevada Bar No. 6718
 Kerry E. Kleiman, Esq.
 Nevada Bar No. 14071
 3883 Howard Hughes Parkway, Suite 800
 Las Vegas, NV 89169
 Tel: 702-550-4400
*Attorneys for Defendant Premier Land
 Title Insurance Company f/k/a Commerce
 Title Insurance Company*

23 IT IS SO ORDERED.

24
 25 
 26 U.S. MAGISTRATE JUDGE
 27

28 Dated: March 16, 2022